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Attorney for Defendant #23
DANIEL ORTEGA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(Honorable Judge Bernard G. Skomal)

UNITED STATES OF AMERICA,)
Plaintiff,)
v .)
DANIEL ORTEGA (23), et al.,)
Defendant.)

Case No.: 15CR2310-WQH

MOTION TO MODIFY
CONDITIONS OF PRE-TRIAL
RELEASE

Mr. ORTEGA seeks a modification of pre-trial release conditions to allow travel to the New York, NY area on work-related business on Wednesday, June 29, 2016 through Friday, July 1, 2016, inclusive.

There is no opposition from Pretrial Services Officer Shakira Davis or Assistant U.S. Attorney Benjamin Katz.

On February 2, 2016, this Court set conditions for Mr. ORTEGA's pre-trial release, including a condition restricting Mr. ORTEGA's travel to the State of California. On February 9, 2016, Mr. ORTEGA posted his own bond.

DATED: June 24, 2016

/s/ Michael L. Crowley
Michael L. Crowley
Attorney for Defendant #23
DANIEL ORTEGA